



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 25, 2018

BY ECF AND HAND

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cohen v. United States, 18 Mag. 3161 (KMW)*

Dear Judge Wood:

By Order dated June 22, 2018, the Court ordered the Plaintiff and Intevenors to complete their designation of potentially privileged material by June 27, 2018. By Affirmation dated June 23, 2018, Intervenor Trump Organization asks for an additional two weeks to complete this process. The Government respectfully submits this letter to oppose Intervenor's request.

The Affirmation makes no mention of the resources the Intervenor has dedicated to this process or why, in light of the small fraction of material provided by Plaintiff for the Intervenors' review—much less found to be privileged by the Special Master to date—such additional time is required. The Government has already consented to an adjournment of the Plaintiff's time to make designations, and it has been nearly three months since execution of the search warrants. Further delay will unreasonably impede the Government's investigation.

That said, if the Court is inclined to grant any adjournment, the Government respectfully submits that it should be no more than one week, or until July 5, 2018, for the designation

process to be completed. The Government expects to oppose any future requests for delay in their entirety.

Respectfully submitted,

ROBERT KHUZAMI
Attorney for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

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